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JM-5630

## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

IN RE:

THOMAS J. POWER, JR.

Case No. 18-20756(JNP)

CHAPTER 13

Hearing Date: 1-8-19

CERTIFICATION OPPOSING DEBTOR'S

MOTION TO REIMPOSE THE

AUTOMATIC STAY

## NORMA ESTRADA certifies as follows:

- 1. I am employed by Nissan Motor Acceptance Corporation ("Nissan") and am familiar with the facts of this case.
- 2. On 12-11-18 Nissan received stay relief as a result of an uncontested motion for relief that it filed. Debtor now moves to reimpose stating that:
  - a. He did not oppose the motion because he did not have the funds to come current, and,
  - b. He has given his attorney \$250 and will tender "additional funds" before the hearing.
- 3. Debtor's motion should be denied. At the present time his account is past due from July 20, 2018 to November 20, 2018.

  Arrears are \$1214.14 plus late charges of \$74.54 for a total

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delinquency of \$1288.78. And, another payment of \$245.53 will fall due on 12-20-18.

I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT.

Dated:

IRVING, TX

Norma Estrada

norma Estrale